

EXHIBIT A

Chang, Esther Kim

From: Ray, Wendy J.
Sent: Monday, October 02, 2017 10:13 AM
To: Gonzalez, Arturo J.; Jordan Jaffe
Cc: UberWaymoMoFoAttorneys; Uber-sg@LISTS.SUSMANGODFREY.COM; BSF_EXTERNAL_UberWaymoLit@bsflp.com; DG-GP Otto Trucking Waymo (DG-GPOttoTruckingWaymo@goodwinlaw.com); QE-Waymo; Matthew Cate (MCate@fbm.com); John Cooper (JCooper@fbm.com)
Subject: RE: Waymo v. Uber - Source Code

Jordan,
I am following up to get a response to Arturo's email below.

Wendy

From: Gonzalez, Arturo J.
Sent: Saturday, September 30, 2017 11:22 PM
To: Jordan Jaffe
Cc: UberWaymoMoFoAttorneys; Uber-sg@LISTS.SUSMANGODFREY.COM; BSF_EXTERNAL_UberWaymoLit@bsflp.com; DG-GP Otto Trucking Waymo (DG-GPOttoTruckingWaymo@goodwinlaw.com); QE-Waymo; Matthew Cate (MCate@fbm.com); John Cooper (JCooper@fbm.com)
Subject: Re: Waymo v. Uber - Source Code

Jordan,

Your consultants have reviewed the code for what, four days? Or is it more than that? Have you found anything? At some point very soon, the drawbridge will come up. You don't have unlimited access to our clients' code and we need to prepare for trial.

Arturo

Sent from my iPad

On Sep 30, 2017, at 11:06 PM, Jordan Jaffe <jordanjaffe@quinnemanuel.com> wrote:

- External Email -

Counsel,

The Otto/Uber source code that our experts have been inspecting has not been made available locally on the hard drive of the inspection machine, and is only accessible through a browser interface. Given the short time frame available for review, the source code files must be provided on the local hard drive, so that they can be reviewed efficiently using source code review tools. In addition, none of the source code inspection computers contain the source code review tool SciTools Understand. Please install SciTools Understand as soon as possible.

In addition, our experts have been unable to locate [REDACTED]
[REDACTED] See, e.g., van der Berg
Tr. 118:16-119:6 [REDACTED]
[REDACTED] See Stroz Report Ex. 37 [REDACTED]
[REDACTED]).

Given these disclosures and the lack of relevant code in the Otto repository, please immediately produce for inspection a current version of Uber source code that includes [REDACTED]
[REDACTED] is an example of a specific reason we need Uber's current source code. As a general matter, given the amount of source code discussed in the Stroz report, Waymo is entitled to discovery of the overlap between any Waymo source code at Uber's agent (Stroz) and Uber's source code. We ask that you update the review machine with the most current Uber source code tomorrow.

Best regards,

Jordan R. Jaffe // Quinn Emanuel // 415.498.0556 // jordanjaffe@quinnemanuel.com